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Attorneys for Plaintiffs
DIANE YOUNG, LANAE JOHNSON, and
PEARL MAGPAYO

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

DIANE YOUNG, LANAE JOHNSON, and
PEARL MAGPAYO, individually and behalf of
all others similarly situated,

Plaintiffs,

v.

SALESFORCE, INC.,

Defendant.

Case No. 4:22-cv-09067-JST

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING CASE
SCHEDULE**

Judge: Hon. Jon S. Tigar

Pursuant to Civil Local Rule 6-2(a) and 7-12, Plaintiffs Diane Young, Lanae Johnson, and Pearl Magpayo and Defendant Salesforce, Inc., by and through their attorneys of record, stipulate and agree to extend the case schedule set forth in **ECF No. 77-1**.

WHEREAS, on October 23, 2024, the Court permitted Plaintiffs to file a Third Amended Complaint substituting Plaintiffs Diane Young and Lanae Johnson for Plaintiff Yockey (**ECF No. 91**);

WHEREAS, after Plaintiffs filed their Third Amended Complaint on October 30, 2024, the parties met and conferred extensively regarding discovery responses, additional document requests regarding the new Plaintiffs, and search terms;

WHEREAS, the parties are proceeding with discovery and the deadline for Plaintiffs' Motion for Class Certification and Expert Disclosures is currently set for April 24, 2025;

WHEREAS, the parties agree that extending existing case deadlines to allow time to complete discovery, prepare class certification briefing, and retain experts is in the interest of justice;

WHEREAS, this is the parties' first request to modify the operative case schedule;

WHEREAS, the parties have conferred and mutually stipulate to extend the case schedule as follows:

Event	Current Deadline	Proposed Deadline
Plaintiffs' Motion for Class Certification and Plaintiffs' Expert Disclosures for all experts due	April 24, 2025	July 18, 2025
Defendant's Opposition to Plaintiffs' Motion for Class Certification, Defendants' Expert Disclosures, and Defendants' <i>Daubert</i> Motions	August 7, 2025	November 3, 2025
Plaintiffs' Reply in Support of Motion for Class Certification, Plaintiffs' Opposition to Defendant's <i>Daubert</i> Motions, and Plaintiffs' <i>Daubert</i> Motions	September 18, 2025	December 22, 2025
Defendant's Reply in Support of its <i>Daubert</i> Motions and Defendant's Opposition to Plaintiffs' <i>Daubert</i> Motions	October 16, 2025	January 29, 2026
Plaintiffs' Reply in Support of their <i>Daubert</i> Motions	October 28, 2025	February 19, 2026

1 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, subject to the approval of the
2 Court, that the case schedule be modified according to the “Proposed Deadline” column provided above.

3 IT IS SO STIPULATED.

4
5 DATED: March 28, 2025

By: /s/ Tiffany Cheung

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24 *Attorneys for Defendant*

1 DATED: March 28, 2025

By: /s/ L. Timothy Fisher

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18 *Attorneys for Plaintiffs*

~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, the Court ORDERS that the following scheduling order is entered:

Event	Deadline
Plaintiffs' Motion for Class Certification and Plaintiffs' Expert Disclosures for all experts due	July 18, 2025
Defendant's Opposition to Plaintiffs' Motion for Class Certification, Defendants' Expert Disclosures, and Defendants' <i>Daubert</i> Motions	November 3, 2025
Plaintiffs' Reply in Support of Motion for Class Certification, Plaintiffs' Opposition to Defendant's <i>Daubert</i> Motions, and Plaintiffs' <i>Daubert</i> Motions	December 22, 2025
Defendant's Reply in Support of its <i>Daubert</i> Motions and Defendant's Opposition to Plaintiffs' <i>Daubert</i> Motions	January 29, 2026
Plaintiffs' Reply in Support of their <i>Daubert</i> Motions	February 19, 2026

IT IS SO ORDERED.

Dated: April 9, 2025


 HON. JON S. TIGAR
 UNITED STATES DISTRICT JUDGE